

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN**

FILED - KZ
August 22, 2018 11:29 AM
U.S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
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Keturah Mixon,

Plaintiff in Pro Per,

Case No. 1:18-cv-499
Honorable Janet T. Neff

Vs.

David Trott, Trott Law P.C. (f/k/a Trott and Trott P.C.)
Carrington Mortgage Services LLC,
(a/k/a Carrington Mortgage Holdings LLC),
Bank of America Corporation,
(a/k/a Bank of America N.A.

Defendants.

Keturah Mixon
243 Devon Road
Battle Creek Mi. 49015
(269) 339-9337
Plaintiff in Pro Per

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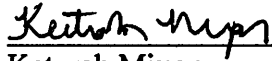
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**PLAINTIFF KETURAH MIXON'S MOTION TO STRIKE DEFENDANT
CARRINGTON MORTGAGE SERVICES LLC'S MOTION TO DISMISS
PURSUANT TO THE FEDERAL RULES OF CIVIL PROCEDURE RULE
12(F) AND MEMORANDUM OF LAW IN SUPPORT**

Comes Now Plaintiff Keturah Mixon with her Motion to strike Defendants' motion to dismiss. The Defendants motion is untimely and the Defendants have not met ANY of the requirements nor have they offered ANY evidence that satisfies their burden of proof for under The Federal Rules of Civil Procedure Rule 12(b)(6). EVERY statement in Defendant's motion is a COMPLETE LIE, and is UNSUPPORTED by even ONE SHRED of EVIDENCE. Defendants have already filed their answer to this complaint therefore their motion is untimely. In Defendants' answer to Plaintiff's complaint, they admitted to ALL of Plaintiff's allegations, as under The Federal Rules of Civil Procedure none of their answers were denials/or deemed denials as proven in Plaintiff's Motion for Judgment on the Pleadings. Defendants' motion is redundant, immaterial, impertinent, and scandalous, and it has no legal basis. There is ABSOLUTELY NO DEFENSE that these defendants can claim in this lawsuit, and every purported defense is legally insufficient. Defendants' case fails from the very top. Plaintiff has NEVER owed MERS, or Bank of America N.A. any money and there has NEVER been a mortgage or a promissory note in Plaintiff's name that was ever assigned to MERS, Bank of America or any of these other defendants. That fact alone is FATAL to the defendants' case and/or any defense to this case. Plaintiff has proven her case by a preponderance of the evidence and Plaintiff is entitled to Judgment as a Matter of Law. Accordingly, Plaintiff requests that This Honorable Court Strike/deny defendant's motion.

Dated: August 14th, 2018

Respectfully submitted,



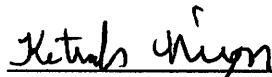
Keturah Nixon
Plaintiff in Pro Per
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CERTIFICATE OF SERVICE AND CONFERENCE

Plaintiff hereby certifies that she conferred with defendants to see if this motion would be opposed, mailed a true and complete copy of the foregoing document along with The memorandum of Law is in Support of, certificate of conference along with the certificate of service, in The U.S. Mail on August 14th, 2018.

Dated: August 14th, 2018

Respectfully submitted,



Keturah Nixon
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Battle Creek MI 49015

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